

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA, ex rel.
T.J. NOVAK,

Plaintiff,

v.

WALGREENS BOOTS ALLIANCE, INC.,

Defendant.

No. 18-cv-05452

Hon. Joan H. Lefkow

JOINT STATEMENT

Plaintiff-Relator T.J. Novak (“Novak”) and Defendant Walgreens Boots Alliance, Inc. (“Walgreens”) respectfully provide this Joint Statement regarding their efforts to settle Novak’s demand for attorneys’ fees and costs, the only outstanding claim against Walgreens in this case.

1. On May 12, 2025, the Court entered an order setting deadlines for compliance with Local Rule 54.3’s various requirements (ECF 75). That order requires the parties to file a joint statement setting forth the information specified in Local Rule 54.3(e) by September 22, 2025, and it requires Novak to move for his attorneys’ fees, expenses, and costs by October 13, 2025.

2. Novak and Walgreens have worked diligently to resolve Novak’s fee demand without the Court’s intervention and have reached a settlement, rendering the submission of a joint statement and fee petition under Local Rule 54.3 unnecessary.

3. Accordingly, the parties anticipate filing a joint motion of dismissal in the coming weeks, once certain obligations under their confidential settlement agreement have been satisfied.

4. Novak’s claims for a share of the state settlement funds, as referenced in § 3(3) of this Court’s dismissal Order dated April 21, 2025 (ECF 72), are unaffected by the settlement between Novak and Walgreens, and Walgreens is not a party to Novak’s claims against the states.

Dated: September 22, 2025

Respectfully submitted,

T.J. NOVAK, Plaintiff-Relator

**WALGREENS BOOTS ALLIANCE, INC.,
Defendant**

By: /s/ William C. Meyers
One of His Attorneys

By: /s/ Tinos Diamantatos
One of Its Attorneys

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